

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MAXINE SNYDMAN
Plaintiff,

v.

AMPER, POLITZINER & MATTIA, LLP
Defendant

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CIVIL ACTION

No. 2:10-cv-01344

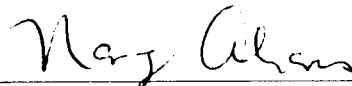
**DECLARATION OF NANCY ABRAMS, ESQUIRE
IN SUPPORT OF
PLAINTIFF MAXINE SNYDMAN'S RESPONSE TO
DEFENDANT AMPER, POLITZINER & MATTIA, LLP'S
MOTION FOR SANCTIONS**

I, Nancy Abrams, Esquire, hereby verify and declare that the following facts are true and correct to the best of my knowledge, information and belief:

1. I am currently one of the attorneys for Plaintiff Maxine Snyderman ("Snyderman") in the above captioned matter and have served as her counsel since its inception.
2. In preparation for the Mediation scheduled in this matter, my co-counsel Alan B. Epstein and I prepared a detailed Mediation Statement that included a full discussion of the facts and legal issues presented and a calculation of Plaintiff's damages based upon her actual time and pay records.
3. On January 31, 2011, the day before the scheduled Mediation, I spoke to Judge Strawbridge and explained that Plaintiff had made the earlier offer of settlement of \$150,000 to Defendant's counsel and, even though the estimation of Plaintiff's damages increased from \$660,285 to \$800,314,

Plaintiff was not changing her offer of settlement from the \$150,000 previously made to Defendant's counsel.

I understand that the statements in this Declaration are made subject to the penalties of 18 Pa.C.S. §4904 and 28 U.S.C. §1746 relating to unsworn falsification to authorities.



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